

12/18/2012
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON D C 20460

1/7

December 18, 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Robert Rosenwasser
Agent for Balico International, Inc
RR Consulting Services Inc
273 Althea Ave
Morrisville, PA 19067

Subject Maintain Pool Pro Concentrated/Stabilized Pool Chlorinating 1" Small Tablets
EPA Registration No 45458-17
Application Dated September 17, 2012
Receipt Dated September 21, 2012

Dear Mr Rosenwasser

This acknowledges the receipt of your Amendment application dated September 17, 2012 in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is **acceptable with comments** listed below

Submission and Proposed Changes

Label amendment to add optional marketing claims, label conversion to a master label format, and change "**Trichlor 1" Tablets**" as the primary brand name for this product Convert "**Maintain Pool Pro Concentrated/Stabilized Pool Chlorinating 1" Small Tablets**" as an ABN In addition add four alternate brand names (ABNs) "**Aquamate Concentrated Pool Chlorinating 1" Small Tablets**", "**Maintain Pool Pro 1" Small Tablets**", "**Aquamate 1" Small Tablets**", and "**Aquamate Concentrated/Stabilized Pool Chlorinating 1" Small Tablets**" for this product Original proposed label dated September 17, 2012 (pin punch 09/21/12)

Comments and Conditions

Based on the submitted materials, the following comments apply

- 1 P 1- The requested primary brand name change to "**Trichlor 1" Tablets**" is acceptable and thus the addition of alternative brand names (ABNs) noted above are acceptable for this product
- 2 P 1 - Re-arrange the order for the "First Aid" statement from the severest to the least toxic effect "**If in Eyes**", "**If on Skin of Clothing**", "**If Swallowed**", and "**If Inhaled**"
- 3 P 1 – Under the "**First Aid Statement**", insert statement to read "**NOTE TO PHYSICIAN Probable mucosal damage may contraindicate the use of gastric lavage**"
- 4 P 3 – Change the word "should" to "must" {see PR Notice 2000-5}

5 P 4 – Change “**CONTAINER DISPOSAL**”, to read “**CONTAINER HANDLING AND DISPOSAL**” {see P R Notice 2007-4}

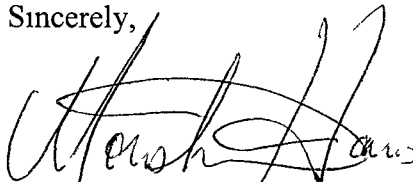
General Comments

A stamped copy of the **label with comments** is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

This amendment and a copy of this letter have been inserted in your file for future reference.

If you have any questions or comments concerning this letter, please contact liem.david@epa.gov or call (703) 305-1284.

Sincerely,

A handwritten signature in black ink, appearing to read 'Monisha Harris', with a large, stylized flourish at the end.

Monisha Harris
Product Manager - Team 32
Regulatory Management Branch II
Antimicrobials Division (7510P)

Att Stamped accepted label with comments

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Trichlor 1 Tablets
EPA Reg No 45458-17
MASTER LABEL-

September 17, 2012

All text in brackets [XX] is optional and may or may not appear on a final label
All text in braces {XX} is administrative and will not appear on a final label

Trichlor 1" Tablets

Alternate Brand Names

Maintain Pool Pro Concentrated/Stabilized Pool Chlorinating 1" Small Tablets
Aquamate Concentrated Pool Chlorinating 1" Small Tablets

Additional Alternate Brand Names

Maintain Pool Pro 1" Small Tablets

Aquamate 1" Small Tablets

Aquamate Concentrated/Stabilized Pool Chlorinating 1" Small Tablets

Active Ingredient

Trichloro-s-Triazinetrione

99 0%

Other Ingredients

1 0%

Total

100 0%

Available chlorine

90%

EPA Reg No 45458-17

EPA Est No _____

ACCEPTED
with COMMENTS
in EPA Letter Dated
DEC 18 2012

KEEP OUT OF REACH OF CHILDREN

DANGER

See First Aid and Additional Precautionary Statements on side panel

Under the Federal Insecticide
Fungicide and Rodenticide Act as
amended for the pesticide
registered under EPA Reg. No.

45458-17

FIRST AID

If In Eyes Hold eye open and rinse slowly and gently with water for 15-20 minutes
Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye
Call a poison control center or doctor for treatment advice

If Inhaled Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration preferably by mouth-to-mouth, if possible
Call a poison control center or doctor for further treatment advice

If On Skin Or Clothing Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice

If Swallowed Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Note to Physician Probable mucosal

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Trichlor 1 Tablets
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September 17 2012

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Have the product container or label with you when calling a poison control center or doctor, or going for treatment

[In the event of a medical or chemical emergency contact ChemTel, Inc
North America 1-800-255-3924]

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER Highly Corrosive

Causes irreversible eye damage and skin burns May be fatal if inhaled or absorbed through the skin Do not breathe dust, vapor or spray mist Irritating to nose and throat Harmful if swallowed Do not get in eyes, on skin or clothing Wear goggles face shield, protective clothing and rubber gloves when handling Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet Remove contaminated clothing and wash clothing before reuse

PHYSICAL OR CHEMICAL HAZARD
STRONG OXIDIZING AGENT

- [1] [●] Use only clean, dry utensils
- [2] [●] Add only into water
- [3] [●] Do not use this product in any chlorinating device which has been used with any product other than trichloro-s-triazinetriene tablets or sticks as the active ingredient Such use may cause fire or explosion
- [4] [●] Contamination with moisture, dirt, organic matter, or other chemicals may start a chemical reaction with generation of heat, liberation of hazardous gases and possible fire and/or explosion
- [5] [●] Avoid any contact with a flaming or burning material

{Environmental hazard statement for end-use products in containers 50 pounds and less}

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic organisms

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling

This product is designed to dissolve slowly (3-7 days) providing a steady source of available chlorine to control the growth of algae, kill bacteria and destroy organic contaminants

[DETERMINE POOL CAPACITY

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September 17 2012

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To establish Pool Capacity follow this simple procedure

Square or Rectangular Pools Multiply length (ft) X width (ft) X avg depth (ft) x 7.5

Oval Pools Multiply long diameter (ft) X short diameter (ft) X avg depth (ft) x 5.9

Round Pools Multiply diameter (ft) X diameter (ft) X avg depth (ft) x 5.9

READ ALL PRECAUTIONARY STATEMENTS BEFORE USE

METHOD OF APPLICATION

- [1][●] Use a floating dispenser, automatic chlorinator or feeder designed for this product[][, or place in skimmer]
- [2][●] Use in a new chlorinating device or any device which has previously contained only this product or whose active ingredient is trichloro-s-triazinetriene [If placed in the skimmer, run the pump a minimum of 8 hours daily]
- [3][●] Do not reuse floaters or feeders from other dry chlorinating products
- [4][●] Do not permit tablets to contact plastic pool linings or metal objects
- [5][●] Do not throw tablets directly into the pool
- [6][●] Do not use with any other tablets or sticks in the same [skimmer,] floater or feeder
- [7][●] Do not use in any chlorinating device which has been used with any other chlorinating compounds

WATER BALANCE

To provide optimum product performance, swimmer comfort and crystal clear water, always maintain a pH from 7.2 to 7.6, total alkalinity from 90 to 125 ppm, and calcium hardness above 200 ppm. Test frequently using a reliable test kit or strip that measures all these ranges. Make any necessary adjustments promptly with the appropriate products.

{Directions to be used for routine pool chlorination}

ROUTINE CHLORINATION Every week (or as needed)

Add four ½ ounce tablets for each 10,000 gallons of pool water to maintain chlorine residual at 1-3 ppm. Follow "Method of Application". This dosage may vary depending upon bather load, water temperature and other conditions. Pool ~~should not~~ be entered until the chlorine residual is 1-3 ppm as measured with a reliable test kit or strip. As a preventative treatment, you ~~should~~ shock treat your pool once per week to prevent pool problems. In addition to weekly shock treatment, you ~~should~~ shock treat to remedy problems which may occur when bathing loads are high, water appears hazy or dull, unpleasant odors or eye irritation occur, after heavy wind and rainstorms, or if algae does develop with resulting green color and slimy feeling. *must*

{Directions to be used for shock treatment}

SHOCK TREATMENT

Adjust pH to 7.2 to 7.4 with appropriate product per label instructions. Shock treat weekly with [brand name]. Shock to kill bacteria, control algae, burn out organic materials and to keep water sparkling clear. Follow label instructions.

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{For nonrefillable containers}

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal

[PESTICIDE STORAGE] Keep this product dry in its tightly closed container when not in use Keep away from heat or flame Store in a cool, dry, well ventilated area

[PESTICIDE DISPOSAL] Pesticide wastes are acutely hazardous Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law

[CONTAINER DISPOSAL] If empty Nonrefillable container Do not reuse or refill this container Place in trash or offer for recycling if available If Partly Filled Call your local solid waste agency or 1-800-CLEANUP for disposal instructions Never place unused product down any indoor or outdoor drain

EMERGENCY HANDLING

In case of contamination or decomposition

- [1] [●] Do not reseal container
- [2] [●] If possible, isolate container in open and well-ventilated area
- [3] [●] Flood with large amounts of water
- [4] [●] Dispose of contaminated material in an approved landfill area

Sold by
Baleco International, Inc
P O Box 11331 Cincinnati, OH 45211 USA

_____ lbs

[Made in the USA]

[Item Number _____]

OPTIONAL MARKETING STATEMENTS

{Optional marketing statements that may be used with routine pool chlorination One or more statements may be combined }

[Concentrated, Stabilized 1" Tablets]

[Stabilized chlorinating tablets for feeder and skimmer application]

[1" Size]

[1" Tablets]

[Sanitizer]

[Long lasting]

Trichlor 1" Tablets
EPA Reg No 45458-17

September 17 2012

MASTER LABEL-

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[Concentrated]
 [Stabilized]
 [1" Chlorinating Tablets]
 [Slow Dissolving]
 [For feeder and skimmer application]
 [Controls Algae]
 [Controls Bacteria and Algae]
 [For Feeder and Skimmer Application]
 [For Routine Use]
 [For Use in Automatic Feeders, Floaters, and Skimmers]
 [Individually Wrapped Tablets]
 [Suppresses algae]
 [Controls Algae and Clarifies]
 [For Routine Sanitation and Clarification]
 [Keeps Water Clear]
 [For Application in Skimmers, Floaters and Feeders]
 [For use in all pool types]{This statement alerts consumer to the fact that they may use
 this product in above ground, in ground, indoor, outdoor, plaster vinyl fiberglass pools}
 [Suitable for use with alternative devices such as ionizers, ozonators, and mineral
 feeders]
 [Sanitizes, Clarifies, and protects against Algae]
 [For lasting protection against organic contaminants]
 [Concentrate]
 [Completely soluble]
 [No mineral scale build-up]